

Dennis Prout
Janco Products, Inc.
920 S. Logan St.
Mishawaka, IN 46544

Re: 141-12313
First Minor Permit Modification to
Part 70 No.: T 141-7550-00129

Dear Dennis Prout:

Janco Products, Inc. was issued a permit on February 1, 2000 for operation of a stationary fiberglass reinforced tube manufacturing source. A letter requesting changes to this permit was received on May 19, 2000. Pursuant to the provisions of 326 IAC 2-7-12 a minor permit modification to this permit is hereby approved as described in the attached Technical Support Document.

The modification consists of modifying an existing paint booth to be used as degreaser using R7K94 and Acetone as solvents.

All other conditions of the permit shall remain unchanged and in effect. Please attach a copy of this modification and the following revised permit pages to the front of the original permit.

This decision is subject to the Indiana Administrative Orders and Procedures Act - IC 4-21.5-3-5. If you have any questions on this matter, please contact Gurinder Saini, OAM, 100 North Senate Avenue, P.O. Box 6015, Indianapolis, Indiana, 46206-6015, or call at (800) 451-6027, press 0 and ask for Gurinder Saini or extension 3-0203, or dial (317) 233-0203.

Sincerely,

Paul Dubenetzky, Chief
Permits Branch
Office of Air Management

Attachments

GS

cc: File - St. Joseph County
U.S. EPA, Region V
St. Joseph County Health Department
Northern Regional Office
Air Compliance Section Inspector - Rick Reynolds
Compliance Data Section - Karen Nowak
Administrative and Development - Janet Mobley
Technical Support and Modeling - Michele Boner

PART 70 OPERATING PERMIT OFFICE OF AIR MANAGEMENT

**Janco Products, Inc.
920 South Logan Street
Mishawaka, Indiana 46544**

(herein known as the Permittee) is hereby authorized to operate subject to the conditions contained herein, the source described in Section A (Source Summary) of this permit.

This permit is issued in accordance with 326 IAC 2 and 40 CFR Part 70 Appendix A and contains the conditions and provisions specified in 326 IAC 2-7 as required by 42 U.S.C. 7401, et. seq. (Clean Air Act as amended by the 1990 Clean Air Act Amendments), 40 CFR Part 70.6, IC 13-15 and IC 13-17.

Operation Permit No.: T 141-7550-00129	
Issued by: Janet G. McCabe, Assistant Commissioner Office of Air Management	Issuance Date: February 1, 2000
First Minor Permit Modification: T 141-12313	Pages Affected: 6, 32-37, 41-43
Issued by: Paul Dubenetzky , Branch Chief Office of Air Management	Issuance Date:

exhausting to stack P1, capacity: 1.0 pound per hour.

- (j) One (1) dual stream pulltrusion machine, identified as Janco 40-D-A and Janco 40-D-B, installed in 1996, exhausting to stack P1, capacity: 1.0 pound per hour.
- (k) One (1) dual stream pulltrusion machine, identified as Janco 42-D-A and Janco 42-D-B, installed in 1996, exhausting to stack P1, capacity: 4.67 pounds per hour.
- (l) One (1) resin mix room, identified as Janco MA-001, constructed in 1997 and exhausting to stack P1.
- (m) One (1) paint booth, identified as Janco booth 1, constructed in 1993, equipped with two (2) high volume, low pressure (HVLP) spray guns and dry filters as overspray control, exhausting to stack PB16, capacity: 66.51 pounds of coating per hour.
- (n) One (1) paint booth, identified as Janco booth 2, constructed in 1977, equipped with two (2) high volume, low pressure (HVLP) spray guns and dry filters as overspray control, exhausting to stack PB17, capacity: 66.51 pounds of coating per hour.
- (o) One (1) paint booth, identified as Janco booth 3, constructed in 1993, equipped with one (1) mechanical high volume, low pressure (HVLP) spray gun and dry filters as overspray control, exhausting to stack PB18, capacity: 66.51 pounds of coating per hour.
- (p) One (1) automatic paint booth, identified as Janco Auto booth 5, constructed in 1998, equipped with two (2) high volume, low pressure spray guns and dry filters as overspray control, exhausting to stacks PB20A and PB20B, capacity: 66.51 pounds of coating per hour.

A.3 Specifically Regulated Insignificant Activities [326 IAC 2-7-1(21)] [326 IAC 2-7-4(c)]
[326 IAC 2-7-5(15)]

This stationary source also includes the following insignificant activities which are specifically regulated, as defined in 326 IAC 2-7-1(21):

- (a) Natural gas-fired combustion sources with heat input equal to or less than ten million (10,000,000) British thermal units per hour. One (1) 0.526 million British thermal units Boiler Natural Gas (Janco SV-56), installed in 1989. [326 IAC 6-1-2] [326 IAC 6-2-4]
- (b) Degreasing operations that do not exceed 145 gallons per 12 months, except if subject to 326 IAC 20-6. One (1) cold degreaser with a solvent usage of 0.048 pounds per hour, installed in 1991. One (1) cold degreaser with a solvent usage of 60 gallons per year. No halogenated solvents are used in these degreaser. [326 IAC 8-3-5]
- (c) The following equipment related to manufacturing activities not resulting in the emission of HAPs: brazing equipment, cutting torches, soldering equipment, welding equipment. [326 IAC 6-1-2]
- (d) Trimmers that do not produce fugitive emissions and that are equipped with a dust collection or trim material recovery device such as a bag filter or cyclone. [326 IAC 6-1-2]
- (e) Grinding and machining operations controlled with fabric filters, scrubbers, mist collectors,

SECTION D.2

FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]

- (m) One (1) paint booth, identified as Janco booth 1, constructed in 1993, equipped with two (2) high volume, low pressure (HVLP) spray guns and dry filters as overspray control, exhausting to stack PB16, capacity: 66.51 pounds of coating per hour.
- (n) One (1) paint booth, identified as Janco booth 2, constructed in 1977, equipped with two (2) high volume, low pressure (HVLP) spray guns and dry filters as overspray control, exhausting to stack PB17, capacity: 66.51 pounds of coating per hour.
- (o) One (1) paint booth, identified as Janco booth 3, constructed in 1993, equipped with one (1) mechanical high volume, low pressure (HVLP) spray gun and dry filters as overspray control, exhausting to stack PB18, capacity: 66.51 pounds of coating per hour.
- (p) One (1) automatic paint booth, identified as Janco Auto booth 5, constructed in 1998, equipped with two (2) high volume, low pressure spray guns and dry filters as overspray control, exhausting to stacks PB20A and PB20B, capacity: 66.51 pounds of coating per hour.

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.2.1 Particulate Matter (PM) [326 IAC 6-1-2(a)]

- (a) Pursuant to 326 IAC 6-1-2(a)(Nonattainment Area Particulate Limitations), particulate matter (PM) emissions from surface coating booths shall be limited to 0.03 grain per dry standard cubic foot. At an air flow rate of 1,400 actual cubic feet per minute from stacks PB16, PB17, and PB18, this is equivalent to 0.360 pound per hour at each stack, and at an air flow rate of 2,500 actual cubic feet per minute at stacks PB20A and PB20B this is equivalent to 0.643 pound per hour at each stack.

D.2.2 Volatile Organic Compound (VOC) [326 IAC 8-1-6]

Pursuant to CP141-5672-00129, the best available control technology (BACT) for the surface coating operations shall be the use of a high volume, low pressure (HVLP) application system at all times during which these processes are operated, and the total amount of VOC delivered to the applicators in the surface coating operation shall not exceed 3.4 tons per month.

D.2.3 Hazardous Air Pollutants (HAPs) [326 IAC 2-4.1-1]

The hazardous air pollutant (HAP) usage at the paint booth identified as Janco Auto booth 5 shall be limited to less than ten (10) tons per twelve (12) consecutive months of each individual HAP and twenty-five (25) tons per twelve (12) consecutive months of any combination of HAPs, each. This will limit HAP emissions from each of the two (2) booths to less than ten (10) tons per year of each individual HAP and less than twenty-five (25) tons per year of total HAPs. Therefore, the requirements of 326 IAC 2-4.1-1 are not applicable to these facilities.

D.2.4 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for these facilities and their control devices.

Compliance Determination Requirements

D.2.5 Testing Requirements [326 IAC 2-7-6(1),(6)][326 IAC 2-1.1-11]

The Permittee is not required to test this facility by this permit. However, IDEM may require compliance testing when necessary to determine if the facility is in compliance. If testing is required by IDEM, compliance with the PM limit specified in Condition D.2.1 shall be determined by a performance test conducted in accordance with Section C - Performance Testing.

D.2.6 Particulate Matter (PM)

The dry filters for PM control shall be in operation and control emissions from the paint booths at all times that the paint booths are in operation.

D.2.7 Volatile Organic Compounds (VOC) and Hazardous Air Pollutants (HAPs)

Compliance with the VOC and HAP usage limitations contained in Conditions D.2.2 and D.2.3 shall be determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) using formulation data supplied by the coating manufacturer. IDEM, OAM, reserves the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.

D.2.8 VOC and HAP Emissions

Compliance with Conditions D.2.2 and D.2.3 shall be demonstrated within 30 days of the end of each month based on the total volatile organic compound usage for the most recent month.

Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]

D.2.9 Monitoring

- (a) Daily inspections shall be performed to verify the placement, integrity and particle loading of the filters. To monitor the performance of the dry filters, weekly observations shall be made of the overspray from the paint booth stacks PB16, PB17, PB18, PB20A and PB20B while one or more of the booths are in operation. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.
- (b) Monthly inspections shall be performed of the coating emissions from the stack and the presence of overspray on the rooftops and the nearby ground. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when a noticeable change in overspray emission, or evidence of overspray emission is observed. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.
- (c) Additional inspections and preventive measures shall be performed as prescribed in the Preventive Maintenance Plan.

Record Keeping and Reporting Requirement [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

D.2.10 Record Keeping Requirements

- (a) To document compliance with Conditions D.2.2 and D.2.3, the Permittee shall maintain records in accordance with (1) through (8) below. Records maintained for (1) through (8) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC and HAP usage limits established in Conditions D.2.2 and D.2.3.

- (1) The amount and VOC content of each coating material and solvent used. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used. Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents;
 - (2) The amount and HAP content of each coating material and solvent used at Janco Auto booth 5. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used. Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents;
 - (3) A log of the dates of use;
 - (4) The cleanup solvent usage for each month;
 - (5) The total VOC usage for each month;
 - (6) The total HAP usage at Janco Auto booth 5 for each month;
 - (7) The weight of VOCs emitted for each compliance period; and
 - (8) The weight of HAPs emitted at Janco Auto booth 5 for each compliance period.
- (b) To document compliance with Condition D.2.9, the Permittee shall maintain a log of weekly overspray observations, daily and monthly inspections, and those additional inspections prescribed by the Preventive Maintenance Plan.
- (c) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

D.2.11 Reporting Requirements

A quarterly summary of the information to document compliance with Conditions D.2.2 and D.2.3 shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported.

SECTION D.3 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)] - Insignificant Activities

- (a) Natural gas-fired combustion sources with heat input equal to or less than ten million (10,000,000) British thermal units per hour. One (1) 0.526 million British thermal units Boiler Natural Gas (Janco SV-56), installed in 1989. [326 IAC 6-1-2] [326 IAC 6-2-4]
- (b) Degreasing operations that do not exceed 145 gallons per 12 months, except if subject to 326 IAC 20-6. One (1) cold degreaser with a solvent usage of 0.048 pounds per hour, installed in 1991. One(1) cold degreaser with a solvent usage of 60 gallons per year. No halogenated solvents are used in these degreaser. [326 IAC 8-3-5]
- (c) The following equipment related to manufacturing activities not resulting in the emission of HAPs: brazing equipment, cutting torches, soldering equipment, welding equipment. [326 IAC 6-1-2]
- (d) Trimmers that do not produce fugitive emissions and that are equipped with a dust collection or trim material recovery device such as a bag filter or cyclone. [326 IAC 6-1-2]
- (e) Grinding and machining operations controlled with fabric filters, scrubbers, mist collectors, wet collectors and electrostatic precipitators with a design grain loading of less than or equal to 0.03 grains per actual cubic foot and a gas flow rate less than or equal to 4,000 actual cubic feet per minute, including the following: deburring; buffing; polishing; abrasive blasting; pneumatic conveying; and woodworking operations. [326 IAC 6-1-2]
- (f) Additional activities or categories with PM emissions equal to or less than the thresholds for insignificant activities:
CNC Milling Center (Janco 60); Centerless Grinder (Janco 61); Centerless Grinder (Janco 62); Vertical Mill (Janco 63); Six (6) Centerless Grinders (Janco 64 through 69); Centerless Belt Grinder (Janco 70); Three (3) Surface Grinders (Janco 71 through 73); Cutter Grinder (Janco 74); Abrasive Cut Off Saw (Janco 75); Five (5) Floor Drill Press Operations (Janco 76 through 80); Seven (7) Turning Center Machines (Janco 81 through 87); Bench Drill Press (Janco 88); Lathe Machine (Janco 89); Two (2) Abrasive Cut Off Saws (Janco 90 through 91); Deburring Machine (Janco 92); Auto Chamfer Machine (Janco 96); Four (4) Dielectric Machines (Janco 97 through 100); Three (3) Abrasive Cut Off Saws (Janco 101 through 103); Four (4) Centerless Grinder Machines (Janco 104 through 107); 6 x 12 Surface Grinder (Janco 108); Ferris Wheel Grinder (Janco 109); Vibratory Deburring Bowl (Janco 110); Pedestal Grinder (Janco 111); Two (2) Dual Head Stock Saws (Janco 112 through 113); Two (2) Abrasive Cut Off Saws (Janco 116 through 117); Dual Chamfering Machine (Janco 118); Surface Grinder (Janco 119); Abrasive Cut Off Saw (Janco 120); Dual Chamfering Machine (Janco 121); Three (3) Centerless Grinders (Janco 123 through 125); Abrasive Cut Off Saw (Janco 126); Two (2) Drill Presses (Janco 127 through 128); Surface Grinder (Janco 129); Abrasive Cut Off Saw (Janco 130); Drill Press (Janco 131); Two (2) Eisle Saws (Janco 132 through 133); Two (2) Centerless Grinders (Janco 134 through 136); Butterfly Surface Grinder (Janco 135); Abrasive Cut Off Saw (Janco 138); Three (3) Turret Lathes (Janco 139 through 141); Two (2) Abrasive Cut Off Saws (Janco 142 through 143); Drum Saw (Janco 144); Pin Saw (Janco 145); Turret Lathe (Janco 146); Two (2) Abrasive Cut Off Saws (Janco 147 and 149); Drill Head Machine (Janco 148); Grinder for Stabbers (Janco 150); Stabber lathe (Janco 151); Two (2) Drill Presses (Janco 152 through 153); Snuffer Drill Machine (Janco 155); Three (3) CNC Turning Machines (Janco 156 through 158); Two (2) Snuffer Sanders (Janco 159 through 160); Two (2) Pedestal Grinders (Janco 162 through 163); Dual Head Saw (Janco 164); Abrasive Saw (Janco 165); 6 x 36 Belt Sander (Janco 167); Drill Press (Janco 168); Two (2) Grinders (Janco 169 through 170); Two (2) Band Saws (Janco 171 through 172); Oxy/Acetylene Torch (Janco 199); Three (3) Surface Grinders (Janco 173 through 175); Zipcut Abrasive Saw (Janco 177); 6 x 18 Surface Grinder (Janco 178); Four (4) Vertical Mills (Janco 179 through 182); Two (2) Lathes (Janco 183 through 184); 6 x 12 Center Grinder (Janco 185); Center Grinder (Janco 186); Cutter Grinder (Janco 187); Abrasive Blast Cabinet (Janco 188); Center Grinder (Janco 189); Drill Press (Janco 190); Vertical Mill (Janco 191); Oxy/Acetylene Torch (Janco 198); Lathe Machine (Janco 192); Twin Bench Grinder (Janco 193); Horizontal Band Saw (Janco 194); Two (2) Abrasive Cut Off Saws (Janco 195 through 196); Twin Head Chamfering Machine (Janco 197); Fifteen (15) Vacuum Cleaners for Particulate Removal; One (1) Stoddard Solvent Tank (Janco 218); Sandborne Centrifugal Separator (Janco 219); Two (2) Centerless Grinders (Janco 220 through 221); Four (4) Chop Saws (Janco 222 through 225); Ulticut Saw (Janco US-1); Four (4) Chop Saws (Janco 227 through 230); Mix Area (Janco 226); Two (2) Small Paint/Fiberglass Mixing Sheds with Vents; One (1) Paint Mix Area in Building #3 Venting to P1 Stack; epoxy spray operations. [326 IAC 6-1-2]

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.3.1 Particulate Matter (PM) [326 IAC 6-1-2]

- (a) Pursuant to 326 IAC 6-1-2(b), the one (1) insignificant natural gas-fired boiler (Janco SV-56), installed in 1989, with a heat input capacity of 0.526 million British thermal units per hour shall have a particulate matter (PM) content of no greater than 0.01 grains per dry standard cubic foot.
- (b) The process operations, listed as (a) and (c) through (f), shall comply with the requirements of 326 IAC 6-2-1(a) which requires that each facility not discharge to the atmosphere any gases which contain PM in excess of 0.07 gram per dry standard cubic meter (g/dscm) (0.03 grain per dry standard cubic foot (dscf)).

D.3.2 Volatile Organic Compounds (VOC) [326 IAC 8-3-2]

The two (2) insignificant cold degreaser will comply with the requirements of 326 IAC 8-3-2 as follows:

Pursuant to 326 IAC 8-3-2 Cold Cleaner operation, the owner or operator of a cold cleaning facility shall:

- (1) equip the cleaner with a cover;
- (2) equip the cleaner with a facility for draining cleaned parts;
- (3) close the degreaser cover whenever parts are not being handled in the cleaner;
- (4) drain cleaned parts for at least fifteen (15) seconds or until dripping ceases;
- (5) provide a permanent, conspicuous label summarizing the operating requirements;
- (6) store waste solvent only in covered containers and not dispose of waste solvent or transfer it to another party, in such a manner that greater than twenty percent (20%) of the waste solvent (by weight) can evaporate into the atmosphere.

D.3.2 Volatile Organic Compounds (VOC) [326 IAC 8-3-2]

The two (2) insignificant cold degreaser will comply with the requirements of 326 IAC 8-3-5 as follows:

- (a) Pursuant to 326 IAC 8-3-5(a) (Cold Cleaner Degreaser Operation and Control), the owner or operator of a cold cleaner degreaser facility shall ensure that the following control equipment requirements are met:
 - (1) Equip the degreaser with a cover. The cover must be designed so that it can be easily operated with one (1) hand if:
 - (A) The solvent volatility is greater than two (2) kiloPascals (fifteen (15) millimeters of mercury or three-tenths (0.3) pounds per square inch) measured at thirty-eight degrees Celsius (38EC) (one hundred degrees Fahrenheit (100EF));

- (B) The solvent is agitated; or
- (C) The solvent is heated.
- (2) Equip the degreaser with a facility for draining cleaned articles. If the solvent volatility is greater than four and three-tenths (4.3) kiloPascals (thirty-two (32) millimeters of mercury or six-tenths (0.6) pounds per square inch) measured at thirty-eight degrees Celsius (38EC) (one hundred degrees Fahrenheit (100EF)), then the drainage facility must be internal such that articles are enclosed under the cover while draining. The drainage facility may be external for applications where an internal type cannot fit into the cleaning system.
- (3) Provide a permanent, conspicuous label which lists the operating requirements outlined in subsection (b).
- (4) The solvent spray, if used, must be a solid, fluid stream and shall be applied at a pressure which does not cause excessive splashing.
- (5) Equip the degreaser with one (1) of the following control devices if the solvent volatility is greater than four and three-tenths (4.3) kiloPascals (thirty-two (32) millimeters of mercury or six-tenths (0.6) pounds per square inch) measured at thirty-eight degrees Celsius (38EC) (one hundred degrees Fahrenheit (100EF)), or if the solvent is heated to a temperature greater than forty-eight and nine-tenths degrees Celsius (48.9EC) (one hundred twenty degrees Fahrenheit (120EF)):
 - (A) A freeboard that attains a freeboard ratio of seventy-five hundredths (0.75) or greater.
 - (B) A water cover when solvent is used is insoluble in, and heavier than, water.
 - (C) Other systems of demonstrated equivalent control such as a refrigerated chiller or carbon adsorption. Such systems shall be submitted to the U.S. EPA as a SIP revision.
- (b) Pursuant to 326 IAC 8-3-5(b) (Cold Cleaner Degreaser Operation and Control), the owner or operator of a cold cleaning facility shall ensure that the following operating requirements are met:
 - (1) Close the cover whenever articles are not being handled in the degreaser.
 - (2) Drain cleaned articles for at least fifteen (15) seconds or until dripping ceases.
 - (3) Store waste solvent only in covered containers and prohibit the disposal or transfer of waste solvent in any manner in which greater than twenty percent (20%) of the waste solvent by weight could evaporate.

Compliance Determination Requirement

D.3.4 Testing Requirements [326 IAC 2-7-6(1),(6)][326 IAC 2-1.1-11]

The Permittee is not required to test these facilities by this permit. However, IDEM may require compliance testing when necessary to determine if the facility is in compliance. If testing is required by IDEM, compliance with the PM limits specified in Condition D.3.1 shall be determined by a performance test conducted in accordance with Section C - Performance Testing.

Janco Products, Inc. First Minor Permit Modification T141-12313
Mishawaka, Indiana Modified by: Gurinder Saini
Permit Reviewer:CAO/MES

Page
OP No. T 141-7550-00129

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR MANAGEMENT
COMPLIANCE DATA SECTION**

**PART 70 OPERATING PERMIT
CERTIFICATION**

Source Name: Janco Products, Inc.
Source Address: 920 South Logan Street, Mishawaka, Indiana 46544
Mailing Address: 920 South Logan Street, Mishawaka, Indiana 46544
Part 70 Permit No.: T 141-7550-00129

This certification shall be included when submitting monitoring, testing reports/results or other documents as required by this permit.

Please check what document is being certified:

- 9 Annual Compliance Certification Letter
- 9 Test Result (specify) _____
- 9 Report (specify) _____
- 9 Notification (specify) _____
- 9 Other (specify) _____

I certify that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.

Signature:

Printed Name:

Title/Position:

Date:

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR MANAGEMENT
COMPLIANCE DATA SECTION
P.O. Box 6015
100 North Senate Avenue
Indianapolis, Indiana 46206-6015
Phone: 317-233-5674
Fax: 317-233-5967

PART 70 OPERATING PERMIT
EMERGENCY/DEVIATION OCCURRENCE REPORT

Source Name: Janco Products, Inc.
Source Address: 920 South Logan Street, Mishawaka, Indiana 46544
Mailing Address: 920 South Logan Street, Mishawaka, Indiana 46544
Part 70 Permit No.: T 141-7550-00129

This form consists of 2 pages

Page 1 of 2

Check either No. 1 or No.2	
9	1. This is an emergency as defined in 326 IAC 2-7-1(12) C The Permittee must notify the Office of Air Management (OAM), within four (4) business hours (1-800-451-6027 or 317-233-5674, ask for Compliance Section); and C The Permittee must submit notice in writing or by facsimile within two (2) days (Facsimile Number: 317-233-5967), and follow the other requirements of 326 IAC 2-7-16
9	2. This is a deviation, reportable per 326 IAC 2-7-5(3)(C) C The Permittee must submit notice in writing within ten (10) calendar days

If any of the following are not applicable, mark N/A

Facility/Equipment/Operation:
Control Equipment:
Permit Condition or Operation Limitation in Permit:
Description of the Emergency/Deviation:
Describe the cause of the Emergency/Deviation:

If any of the following are not applicable, mark N/A

Page 2 of 2

Date/Time Emergency/Deviation started:
Date/Time Emergency/Deviation was corrected:
Was the facility being properly operated at the time of the emergency/deviation? Y N Describe:
Type of Pollutants Emitted: TSP, PM-10, SO ₂ , VOC, NO _x , CO, Pb, other:
Estimated amount of pollutant(s) emitted during emergency/deviation:
Describe the steps taken to mitigate the problem:
Describe the corrective actions/response steps taken:
Describe the measures taken to minimize emissions:
If applicable, describe the reasons why continued operation of the facilities are necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw materials of substantial economic value:

Form Completed by: _____

Title / Position: _____

Date: _____

Phone: _____

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR MANAGEMENT
COMPLIANCE DATA SECTION**

Part 70 Quarterly Report

Source Name: Janco Products, Inc.
Source Address: 920 South Logan Street, Mishawaka, Indiana 46544
Mailing Address: 920 South Logan Street, Mishawaka, Indiana 46544
Part 70 Permit No.: T 141-7550-00129
Facility: Four (4) paint booths (Janco booth 1, Janco booth 2, Janco booth 3, and Janco Auto booth 5)
Parameter: VOC delivered to the applicators
Limit: 3.4 tons per month, total

YEAR: _____

Month 1	Month 2	Month 3

9 No deviation occurred in this month.

9 Deviation/s occurred in this month.

Deviation has been reported on: _____

Submitted by: _____

Title/Position: _____

Signature: _____

Date: _____

Phone: _____

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**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR MANAGEMENT
COMPLIANCE DATA SECTION**

Part 70 Quarterly Report

Source Name: Janco Products, Inc.
Source Address: 920 South Logan Street, Mishawaka, Indiana 46544
Mailing Address: 920 South Logan Street, Mishawaka, Indiana 46544
Part 70 Permit No.: T 141-7550-00129
Facility: One (1) paint booth (Janco Auto booth 5)
Parameter: Individual HAP usage
Limit: Less than ten (10) tons per twelve (12) consecutive months

YEAR: _____

Month	Column 1	Column 2	Column 1 + Column 2
	This Month	Previous 11 Months	12 Month Total

9 No deviation occurred in this month.

9 Deviation/s occurred in this month.

Deviation has been reported on: _____

Submitted by: _____

Title/Position: _____

Signature: _____

Date: _____

Phone: _____

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR MANAGEMENT
COMPLIANCE DATA SECTION**

Part 70 Quarterly Report

Source Name: Janco Products, Inc.
Source Address: 920 South Logan Street, Mishawaka, Indiana 46544
Mailing Address: 920 South Logan Street, Mishawaka, Indiana 46544
Part 70 Permit No.: T 141-7550-00129
Facility: One (1) paint booth (Janco Auto booth 5)
Parameter: Total HAP usage
Limit: Less than twenty-five (25) tons per twelve (12) consecutive months

YEAR: _____

Month	Column 1	Column 2	Column 1 + Column 2
	This Month	Previous 11 Months	12 Month Total

9 No deviation occurred in this month.

9 Deviation/s occurred in this month.

Deviation has been reported on: _____

Submitted by: _____

Title/Position: _____

Signature: _____

Date: _____

Phone: _____

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR MANAGEMENT
COMPLIANCE DATA SECTION**

**PART 70 OPERATING PERMIT
QUARTERLY COMPLIANCE MONITORING REPORT**

Source Name: Janco Products, Inc.
Source Address: 920 South Logan Street, Mishawaka, Indiana 46544
Mailing Address: 920 South Logan Street, Mishawaka, Indiana 46544
Part 70 Permit No.: T 141-7550-00129

Months: _____ **to** _____ **Year:** _____

This report is an affirmation that the source has met all the compliance monitoring requirements stated in this permit. This report shall be submitted quarterly. Any deviation from the compliance monitoring requirements and the date(s) of each deviation must be reported. Additional pages may be attached if necessary. This form can be supplemented by attaching the Emergency/Deviation Occurrence Report. If no deviations occurred, please specify in the box marked "No deviations occurred this reporting period".

9 NO DEVIATIONS OCCURRED THIS REPORTING PERIOD.

9 THE FOLLOWING DEVIATIONS OCCURRED THIS REPORTING PERIOD.

Compliance Monitoring Requirement (e.g. Permit Condition D.1.3)	Number of Deviations	Date of each Deviation

Form Completed By: _____

Title/Position: _____

Date: _____

Phone: _____

Attach a signed certification to complete this report.

**Indiana Department of Environmental Management
Office of Air Management
and St. Joseph County Health Department**

**Technical Support Document (TSD) for a Minor Permit Modification to
a Part 70 Operating Permit**

Source Background and Description

Source Name:	Janco Products, Inc.
Source Location:	920 South Logan Street, Mishawaka, Indiana 46544
County:	St. Joseph
SIC Code:	3089
Operation Permit No.:	T 141-7550-00129
Operation Permit Issuance Date:	February 1, 2000
Permit Modification No.:	T 141-12313-00129
Permit Reviewer:	Gurinder Saini

The Office of Air Management (OAM) has reviewed a modification application from Janco Products, Inc. relating to the operation of a fiberglass reinforced tube manufacturing source.

History

On May 19, 2000, Janco Products, Inc. submitted an application to the OAM requesting to discontinue the use of Booth #4 for painting operations and to use it as degreaser at their existing plant. Janco Products, Inc. was issued a Part 70 permit on February 1, 2000. Therefore, Section A and D of this permit are modified to reflect the above change.

Existing Approvals

The source was issued a Part 70 Operating Permit T141-7550-00129 on February 1, 2000.

Justification for Modification

The Part 70 Operating permit is being modified through a Part 70 Minor Permit Modification. This modification is being performed pursuant to 326 IAC 2-7-12 (c) (1)(B) for processing exempt additions.

Enforcement Issue

There are no enforcement actions pending.

Recommendation

The staff recommends to the Commissioner that the Minor Permit Modification be approved. This recommendation is based on the following facts and conditions:

Unless otherwise stated, information used in this review was derived from the application and additional information submitted by the applicant.

An application for the purposes of this review was received on May 19, 2000.

Permit Changes

The Permittee has requested the following permit changes. The modifications in the permit are shown using the **bold** and ~~strikeout~~ method.

1. Paint Booth #4 will no longer be used for painting operation. Hence all references to this paint booth in Section A and D of the permit are removed.

Section A.2 is modified as follows:

- (p) ~~One (1) paint booth, identified as Janco booth 4, constructed in 1998, equipped with two (2) high volume, low pressure spray guns and dry filters as overspray control, exhausting to stack PB19, capacity: 66.51 pounds of coating per hour.~~

Item (q) in this Section is renumbered as (p).

Section D.2 is modified as follows:

SECTION D.2 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]

- (m) One (1) paint booth, identified as Janco booth 1, constructed in 1993, equipped with two (2) high volume, low pressure (HVLP) spray guns and dry filters as overspray control, exhausting to stack PB16, capacity: 66.51 pounds of coating per hour.
- (n) One (1) paint booth, identified as Janco booth 2, constructed in 1977, equipped with two (2) high volume, low pressure (HVLP) spray guns and dry filters as overspray control, exhausting to stack PB17, capacity: 66.51 pounds of coating per hour.
- (o) One (1) paint booth, identified as Janco booth 3, constructed in 1993, equipped with one (1) mechanical high volume, low pressure (HVLP) spray gun and dry filters as overspray control, exhausting to stack PB18, capacity: 66.51 pounds of coating per hour.
- ~~(p) One (1) paint booth, identified as Janco booth 4, constructed in 1998, equipped with two (2) high volume, low pressure spray guns and dry filters as overspray control, exhausting to stack PB19, capacity: 66.51 pounds of coating per hour.~~
- ~~(q)~~**(p)** One (1) automatic paint booth, identified as Janco Auto booth 5, constructed in 1998, equipped with two (2) high volume, low pressure spray guns and dry filters as overspray control, exhausting to stacks PB20A and PB20B, capacity: 66.51 pounds of coating per hour.

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.2.1 Particulate Matter (PM) [326 IAC 6-1-2(a)]

- (a) Pursuant to 326 IAC 6-1-2(a)(Nonattainment Area Particulate Limitations), particulate matter (PM) emissions from surface coating booths shall be limited to 0.03 grain per dry standard cubic foot. At an air flow rate of 1,400 actual cubic feet per minute from stacks PB16, PB17, **and** PB18, ~~and PB19~~, this is equivalent to 0.360 pound per hour at each stack, and at an air flow rate of 2,500 actual cubic feet per minute at stacks PB20A and PB20B this is equivalent to 0.643 pound per hour at each stack.

~~(b) Condition 2 of CP 141-10261-00129, issued on December 4, 1998, which states that pursuant to 326 IAC 6-3, the PM emissions from Paint Booth #4 shall not exceed the pound per hour emission rate established as E in the following formula, Interpolation and extrapolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by the use of the equation:~~

$$\text{E} = 4.10\text{P}^{0.67}$$

where E = rate of emission in pounds per hour;
and
P = process weight in tons per hour.

~~is not applicable because the source has a potential to emit greater than 100 tons per year of PM and the source is located in St. Joseph County. Therefore, the requirements of 326 IAC 6-1 (Particulate Nonattainment Area Limitations) are applicable. Pursuant to 326 IAC 6-3-1(b), a facility is exempt from 326 IAC 6-3 if any limitation established by the rule is inconsistent with applicable limitations contained in 326 IAC 6-1.~~

D.2.2 Volatile Organic Compound (VOC) [326 IAC 8-1-6]

Pursuant to CP141-5672-00129, the best available control technology (BACT) for the surface coating operations shall be the use of a high volume, low pressure (HVLP) application system at all times during which these processes are operated, and the total amount of VOC delivered to the applicators in the surface coating operation shall not exceed 3.4 tons per month.

D.2.3 Hazardous Air Pollutants (HAPs) [326 IAC 2-4.1-1]

The hazardous air pollutant (HAP) usage at the ~~two (2)~~ paint booths identified as ~~Janco booth 4 and~~ Janco Auto booth 5 shall be limited to less than ten (10) tons per twelve (12) consecutive months of each individual HAP and twenty-five (25) tons per twelve (12) consecutive months of any combination of HAPs, each. This will limit HAP emissions from each of the two (2) booths to less than ten (10) tons per year of each individual HAP and less than twenty-five (25) tons per year of total HAPs. Therefore, the requirements of 326 IAC 2-4.1-1 are not applicable to these facilities.

D.2.4 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for these facilities and their control devices.

Compliance Determination Requirements

D.2.5 Testing Requirements [326 IAC 2-7-6(1),(6)][326 IAC 2-1.1-11]

The Permittee is not required to test this facility by this permit. However, IDEM may require compliance testing when necessary to determine if the facility is in compliance. If testing is required by IDEM, compliance with the PM limit specified in Condition D.2.1 shall be determined by a performance test conducted in accordance with Section C - Performance Testing.

D.2.6 Particulate Matter (PM)

The dry filters for PM control shall be in operation and control emissions from the paint booths at all times that the paint booths are in operation.

D.2.7 Volatile Organic Compounds (VOC) and Hazardous Air Pollutants (HAPs)

Compliance with the VOC and HAP usage limitations contained in Conditions D.2.2 and D.2.3 shall be determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) using formulation data supplied by the coating manufacturer. IDEM, OAM, reserves the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.

D.2.8 VOC and HAP Emissions

Compliance with Conditions D.2.2 and D.2.3 shall be demonstrated within 30 days of the end of each month based on the total volatile organic compound usage for the most recent month.

Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]

D.2.9 Monitoring

- (a) Daily inspections shall be performed to verify the placement, integrity and particle loading of the filters. To monitor the performance of the dry filters, weekly observations shall be made of the overspray from the paint booth stacks PB16, PB17, PB18, ~~PB19~~, PB20A and PB20B while one or more of the booths are in operation. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.
- (b) Monthly inspections shall be performed of the coating emissions from the stack and the presence of overspray on the rooftops and the nearby ground. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when a noticeable change in overspray emission, or evidence of overspray emission is observed. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.
- (c) Additional inspections and preventive measures shall be performed as prescribed in the Preventive Maintenance Plan.

Record Keeping and Reporting Requirement [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

D.2.10 Record Keeping Requirements

- (a) To document compliance with Conditions D.2.2 and D.2.3, the Permittee shall maintain records in accordance with (1) through (8) below. Records maintained for (1) through (8) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC and HAP usage limits established in Conditions D.2.2 and D.2.3.

- (1) The amount and VOC content of each coating material and solvent used. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used. Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents;
 - (2) The amount and HAP content of each coating material and solvent used at ~~Janco booth 4 and~~ Janco Auto booth 5. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used. Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents;
 - (3) A log of the dates of use;
 - (4) The cleanup solvent usage for each month;
 - (5) The total VOC usage for each month;
 - (6) The total HAP usage at ~~Janco booth 4 and~~ Janco Auto booth 5 for each month;
 - (7) The weight of VOCs emitted for each compliance period; and
 - (8) The weight of HAPs emitted at ~~Janco booth 4 and~~ Janco Auto booth 5 for each compliance period.
- (b) To document compliance with Condition D.2.9, the Permittee shall maintain a log of weekly overspray observations, daily and monthly inspections, and those additional inspections prescribed by the Preventive Maintenance Plan.
- (c) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

D.2.11 Reporting Requirements

A quarterly summary of the information to document compliance with Conditions D.2.2 and D.2.3 shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported.

Pages 41 to 43 of the permit are modified to remove all references to Paint booth# 4 in the reporting forms. Form on page 41 is modified, on page 42 and 43 are completely removed. These pages are left blank to avoid re-numbering the entire permit.

2. The booth #4 will be used for cleaning and degreasing operation using Acetone and R7K94 solvents. This activity will be added as an insignificant activity in the permit.

Section A.3 is modified as follows:

- (b) Degreasing operations that do not exceed 145 gallons per 12 months, except if subject to 326 IAC 20-6. One (1) cold degreaser with a solvent usage of 0.048 pounds per hour, installed in 1991. **One (1) cold degreaser with a solvent usage of 60 gallons per year.** No halogenated solvents are used in ~~this~~ **these** degreaser. [326 IAC 8-3-5]

In Section D.3 OAM has observed an incorrect application of rule [326 IAC 8-3-2 and 8-3-5] related to cold degreasing operation. As the degreaser which was already included in the permit and Booth#4 which will be used as degreaser as per this modification, do not have remote solvent reservoirs, both rules [326 IAC 8-3-2 and 8-3-5] apply. Therefore Section D.3 is modified as follows:

SECTION D.3 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)] - Insignificant Activities

- (a) Natural gas-fired combustion sources with heat input equal to or less than ten million (10,000,000) British thermal units per hour. One (1) 0.526 million British thermal units Boiler Natural Gas (Janco SV-56), installed in 1989. [326 IAC 6-1-2] [326 IAC 6-2-4]
- (b) Degreasing operations that do not exceed 145 gallons per 12 months, except if subject to 326 IAC 20-6. One (1) cold degreaser with a solvent usage of 0.048 pounds per hour, installed in 1991. **One (1) cold degreaser with a solvent usage of 60 gallons per year.** No halogenated solvents are used in ~~this~~ **these** degreaser. [326 IAC 8-3-5]
- (c) The following equipment related to manufacturing activities not resulting in the emission of HAPs: brazing equipment, cutting torches, soldering equipment, welding equipment. [326 IAC 6-1-2]
- (d) Trimmers that do not produce fugitive emissions and that are equipped with a dust collection or trim material recovery device such as a bag filter or cyclone. [326 IAC 6-1-2]
- (e) Grinding and machining operations controlled with fabric filters, scrubbers, mist collectors, wet collectors and electrostatic precipitators with a design grain loading of less than or equal to 0.03 grains per actual cubic foot and a gas flow rate less than or equal to 4,000 actual cubic feet per minute, including the following: deburring; buffing; polishing; abrasive blasting; pneumatic conveying; and woodworking operations. [326 IAC 6-1-2]
- (f) Additional activities or categories with PM emissions equal to or less than the thresholds for insignificant activities:
CNC Milling Center (Janco 60); Centerless Grinder (Janco 61); Centerless Grinder (Janco 62); Vertical Mill (Janco 63); Six (6) Centerless Grinders (Janco 64 through 69); Centerless Belt Grinder (Janco 70); Three (3) Surface Grinders (Janco 71 through 73); Cutter Grinder (Janco 74); Abrasive Cut Off Saw (Janco 75); Five (5) Floor Drill Press Operations (Janco 76 through 80); Seven (7) Turning Center Machines (Janco 81 through 87); Bench Drill Press (Janco 88); Lathe Machine (Janco 89); Two (2) Abrasive Cut Off Saws (Janco 90 through 91); Deburring Machine (Janco 92); Auto Chamfer Machine (Janco 96); Four (4) Dielectric Machines (Janco 97 through 100); Three (3) Abrasive Cut Off Saws (Janco 101 through 103); Four (4) Centerless Grinder Machines (Janco 104 through 107); 6 x 12 Surface Grinder (Janco 108); Ferris Wheel Grinder (Janco 109); Vibratory Deburring Bowl (Janco 110); Pedestal Grinder (Janco 111); Two (2) Dual Head Stock Saws (Janco 112 through 113); Two (2) Abrasive Cut Off Saws (Janco 116 through 117); Dual Chamfering Machine (Janco 118); Surface Grinder (Janco 119); Abrasive Cut Off Saw (Janco 120); Dual Chamfering Machine (Janco 121); Three (3) Centerless Grinders (Janco 123 through 125); Abrasive Cut Off Saw (Janco

126); Two (2) Drill Presses (Janco 127 through 128); Surface Grinder (Janco 129); Abrasive Cut Off Saw (Janco 130); Drill Press (Janco 131); Two (2) Eisle Saws (Janco 132 through 133); Two (2) Centerless Grinders (Janco 134 through 136); Butterfly Surface Grinder (Janco 135); Abrasive Cut Off Saw (Janco 138); Three (3) Turret Lathes (Janco 139 through 141); Two (2) Abrasive Cut Off Saws (Janco 142 through 143); Drum Saw (Janco 144); Pin Saw (Janco 145); Turret Lathe (Janco 146); Two (2) Abrasive Cut Off Saws (Janco 147 and 149); Drill Head Machine (Janco 148); Grinder for Stabbers (Janco 150); Stabber lathe (Janco 151); Two (2) Drill Presses (Janco 152 through 153); Snuffer Drill Machine (Janco 155); Three (3) CNC Turning Machines (Janco 156 through 158); Two (2) Snuffer Sanders (Janco 159 through 160); Two (2) Pedestal Grinders (Janco 162 through 163); Dual Head Saw (Janco 164); Abrasive Saw (Janco 165); 6 x 36 Belt Sander (Janco 167); Drill Press (Janco 168); Two (2) Grinders (Janco 169 through 170); Two (2) Band Saws (Janco 171 through 172); Oxy/Acetylene Torch (Janco 199); Three (3) Surface Grinders (Janco 173 through 175); Zipcut Abrasive Saw (Janco 177); 6 x 18 Surface Grinder (Janco 178); Four (4) Vertical Mills (Janco 179 through 182); Two (2) Lathes (Janco 183 through 184); 6 x 12 Center Grinder (Janco 185); Center Grinder (Janco 186); Cutter Grinder (Janco 187); Abrasive Blast Cabinet (Janco 188); Center Grinder (Janco 189); Drill Press (Janco 190); Vertical Mill (Janco 191); Oxy/Acetylene Torch (Janco 198); Lathe Machine (Janco 192); Twin Bench Grinder (Janco 193); Horizontal Band Saw (Janco 194); Two (2) Abrasive Cut Off Saws (Janco 195 through 196); Twin Head Chamfering Machine (Janco 197); Fifteen (15) Vacuum Cleaners for Particulate Removal; One (1) Stoddard Solvent Tank (Janco 218); Sandborne Centrifugal Separator (Janco 219); Two (2) Centerless Grinders (Janco 220 through 221); Four (4) Chop Saws (Janco 222 through 225); Ulticut Saw (Janco US-1); Four (4) Chop Saws (Janco 227 through 230); Mix Area (Janco 226); Two (2) Small Paint/Fiberglass Mixing Sheds with Vents; One (1) Paint Mix Area in Building #3 Venting to P1 Stack; epoxy spray operations. [326 IAC 6-1-2]

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.3.1 Particulate Matter (PM) [326 IAC 6-1-2]

- (a) Pursuant to 326 IAC 6-1-2(b), the one (1) insignificant natural gas-fired boiler (Janco SV-56), installed in 1989, with a heat input capacity of 0.526 million British thermal units per hour shall have a particulate matter (PM) content of no greater than 0.01 grains per dry standard cubic foot.
- (b) The process operations, listed as (a) and (c) through (f), shall comply with the requirements of 326 IAC 6-2-1(a) which requires that each facility not discharge to the atmosphere any gases which contain PM in excess of 0.07 gram per dry standard cubic meter (g/dscm) (0.03 grain per dry standard cubic foot (dscf)).

D.3.2 Volatile Organic Compounds (VOC) [326 IAC 8-3-2] [326 IAC 8-3-5]

~~The one (1) two (2) insignificant cold degreasers will comply with the requirements of 326 IAC 8-3-2 and 326 IAC 8-3-5 as follows:~~

- ~~(a) Pursuant to 326 IAC 8-3-5(a) (Cold Cleaner Degreaser Operation and Control), the owner or operator of a cold cleaner degreaser facility shall ensure that the following control equipment requirements are met:~~

- ~~_____ (1) Equip the degreaser with a cover. The cover must be designed so that it can be easily operated with one (1) hand if:~~
 - ~~_____ (A) The solvent volatility is greater than two (2) kiloPascals (fifteen (15) millimeters of mercury or three tenths (0.3) pounds per square inch) measured at thirty-eight degrees Celsius (38°C) (one hundred degrees Fahrenheit (100°F));~~
 - ~~_____ (B) The solvent is agitated; or~~
 - ~~_____ (C) The solvent is heated.~~
- ~~_____ (2) Equip the degreaser with a facility for draining cleaned articles. If the solvent volatility is greater than four and three tenths (4.3) kiloPascals (thirty-two (32) millimeters of mercury or six tenths (0.6) pounds per square inch) measured at thirty-eight degrees Celsius (38°C) (one hundred degrees Fahrenheit (100°F)), then the drainage facility must be internal such that articles are enclosed under the cover while draining. The drainage facility may be external for applications where an internal type cannot fit into the cleaning system.~~
- ~~_____ (3) Provide a permanent, conspicuous label which lists the operating requirements outlined in subsection (b).~~
- ~~_____ (4) The solvent spray, if used, must be a solid, fluid stream and shall be applied at a pressure which does not cause excessive splashing.~~
- ~~_____ (5) Equip the degreaser with one (1) of the following control devices if the solvent volatility is greater than four and three tenths (4.3) kiloPascals (thirty-two (32) millimeters of mercury or six tenths (0.6) pounds per square inch) measured at thirty-eight degrees Celsius (38°C) (one hundred degrees Fahrenheit (100°F)), or if the solvent is heated to a temperature greater than forty-eight and nine tenths degrees Celsius (48.9°C) (one hundred twenty degrees Fahrenheit (120°F)):~~
 - ~~_____ (A) A freeboard that attains a freeboard ratio of seventy-five hundredths (0.75) or greater.~~
 - ~~_____ (B) A water cover when solvent is used is insoluble in, and heavier than, water.~~
 - ~~_____ (C) Other systems of demonstrated equivalent control such as a refrigerated chiller or carbon adsorption. Such systems shall be submitted to the U.S. EPA as a SIP revision.~~
- ~~_____ (b) Pursuant to 326 IAC 8-3-5(b) (Cold Cleaner Degreaser Operation and Control), the owner or operator of a cold cleaning facility shall ensure that the following operating requirements are met:~~
 - ~~_____ (1) Close the cover whenever articles are not being handled in the degreaser.~~
 - ~~_____ (2) Drain cleaned articles for at least fifteen (15) seconds or until dripping ceases.~~

- ~~(3) — Store waste solvent only in covered containers and prohibit the disposal or transfer of waste solvent in any manner in which greater than twenty percent (20%) of the waste solvent by weight could evaporate.~~

D.3.2 Volatile Organic Compounds (VOC) [326 IAC 8-3-2]

The two (2) insignificant cold degreaser will comply with the requirements of 326 IAC 8-3-2 as follows:

Pursuant to 326 IAC 8-3-2 Cold Cleaner operation, the owner or operator of a cold cleaning facility shall:

- (1) equip the cleaner with a cover;
- (2) equip the cleaner with a facility for draining cleaned parts;
- (3) close the degreaser cover whenever parts are not being handled in the cleaner;
- (4) drain cleaned parts for at least fifteen (15) seconds or until dripping ceases;
- (5) provide a permanent, conspicuous label summarizing the operating requirements;
- (6) store waste solvent only in covered containers and not dispose of waste solvent or transfer it to another party, in such a manner that greater than twenty percent (20%) of the waste solvent (by weight) can evaporate into the atmosphere.

D.3.3 Volatile Organic Compounds (VOC) [326 IAC 8-3-5]

The two (2) insignificant cold degreaser will comply with the requirements of 326 IAC 8-3-5 as follows:

- (a) Pursuant to 326 IAC 8-3-5(a) (Cold Cleaner Degreaser Operation and Control), the owner or operator of a cold cleaner degreaser facility shall ensure that the following control equipment requirements are met:
 - (1) Equip the degreaser with a cover. The cover must be designed so that it can be easily operated with one (1) hand if:
 - (A) The solvent volatility is greater than two (2) kiloPascals (fifteen (15) millimeters of mercury or three-tenths (0.3) pounds per square inch) measured at thirty-eight degrees Celsius (38°C) (one hundred degrees Fahrenheit (100°F));
 - (B) The solvent is agitated; or
 - (C) The solvent is heated.
 - (2) Equip the degreaser with a facility for draining cleaned articles. If the solvent volatility is greater than four and three-tenths (4.3) kiloPascals (thirty-two (32) millimeters of mercury or six-

tenths (0.6) pounds per square inch) measured at thirty-eight degrees Celsius (38°C) (one hundred degrees Fahrenheit (100°F)), then the drainage facility must be internal such that articles are enclosed under the cover while draining. The drainage facility may be external for applications where an internal type cannot fit into the cleaning system.

- (3) Provide a permanent, conspicuous label which lists the operating requirements outlined in subsection (b).
- (4) The solvent spray, if used, must be a solid, fluid stream and shall be applied at a pressure which does not cause excessive splashing.
- (5) Equip the degreaser with one (1) of the following control devices if the solvent volatility is greater than four and three-tenths (4.3) kiloPascals (thirty-two (32) millimeters of mercury or six-tenths (0.6) pounds per square inch) measured at thirty-eight degrees Celsius (38°C) (one hundred degrees Fahrenheit (100°F)), or if the solvent is heated to a temperature greater than forty-eight and nine-tenths degrees Celsius (48.9°C) (one hundred twenty degrees Fahrenheit (120°F)):
 - (A) A freeboard that attains a freeboard ratio of seventy-five hundredths (0.75) or greater.
 - (B) A water cover when solvent is used is insoluble in, and heavier than, water.
 - (C) Other systems of demonstrated equivalent control such as a refrigerated chiller or carbon adsorption. Such systems shall be submitted to the U.S. EPA as a SIP revision.
- (b) Pursuant to 326 IAC 8-3-5(b) (Cold Cleaner Degreaser Operation and Control), the owner or operator of a cold cleaning facility shall ensure that the following operating requirements are met:
 - (1) Close the cover whenever articles are not being handled in the degreaser.
 - (2) Drain cleaned articles for at least fifteen (15) seconds or until dripping ceases.
 - (3) Store waste solvent only in covered containers and prohibit the disposal or transfer of waste solvent in any manner in which greater than twenty percent (20%) of the waste solvent by weight could evaporate.

Compliance Determination Requirement

D.3.3 4 Testing Requirements [326 IAC 2-7-6(1),(6)][326 IAC 2-1.1-11]

The Permittee is not required to test these facilities by this permit. However,

IDEM may require compliance testing when necessary to determine if the facility is in compliance. If testing is required by IDEM, compliance with the PM limits specified in Condition D.3.1 shall be determined by a performance test conducted in accordance with Section C - Performance Testing.

Emission Calculations

See Appendix A page 1 and 2 of this document for detailed emissions calculations.

Potential To Emit

Pursuant to 326 IAC 2-1.1-1(16), Potential to Emit is defined as the maximum capacity of a stationary source to emit any air pollutant under its physical and operational design. Any physical or operational limitation on the capacity of a source to emit an air pollutant, including air pollution control equipment and restrictions on hours of operation or type or amount of material combusted, stored, or processed shall be treated as part of its design if the limitation is enforceable by the U. S. EPA.

Pollutant	Potential To Emit (tons/year)
PM	-
PM-10	-
SO ₂	-
VOC	2.24
CO	-
NO _x	-

Note: For the purpose of determining Title V applicability for particulates, PM-10, not PM, is the regulated pollutant in consideration.

HAP-s	Potential To Emit (tons/year)
Toluene	0.45
Methyl Ethyl Ketone	0.56
TOTAL	1.01

The emissions of criteria pollutants are insignificant from this activity.

County Attainment Status

The source is located in St. Joseph County.

Pollutant	Status (attainment, maintenance attainment, or unclassifiable; severe, moderate, or marginal nonattainment)
PM-10	Attainment
SO ₂	Attainment
NO ₂	Attainment
Ozone	Maintenance
CO	Attainment
Lead	Attainment

- (a) Volatile organic compounds (VOC) and oxides of nitrogen (NO_x) are precursors for the formation of ozone. Therefore, VOC and NO_x emissions are considered when evaluating the rule applicability relating to the ozone standards. St. Joseph County has been designated as nonattainment for ozone.

Federal Rule Applicability

- (a) There are no New Source Performance Standards (NSPS)(326 IAC 12 and 40 CFR Part 60) applicable to this source.
- (b) There are no National Emission Standards for Hazardous Air Pollutants (NESHAPs)(326 IAC 14 and 40 CFR Part 63) applicable to this source. The degreasing operation does not use halogenated solvents so subpart T does not apply.

State Rule Applicability - Entire Source

326 IAC 5-1 (Visible Emissions Limitations)

Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-3 (Temporary Exemptions), opacity shall meet the following, unless otherwise stated in this permit:

- (a) Opacity shall not exceed an average of forty percent (40%) any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.
- (b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings) as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.

State Rule Applicability – Cold Degreaser

326 IAC 8-3-2 (Organic solvent degreasing operations: cold cleaner operation)

The insignificant cold degreaser will comply with the requirements of 326 IAC 8-3-2 as follows:

Pursuant to 326 IAC 8-3-2 Cold Cleaner operation, the owner or operator of a cold cleaning facility shall:

- (1) equip the cleaner with a cover;
- (2) equip the cleaner with a facility for draining cleaned parts;
- (3) close the degreaser cover whenever parts are not being handled in the cleaner;
- (4) drain cleaned parts for at least fifteen (15) seconds or until dripping ceases;
- (5) provide a permanent, conspicuous label summarizing the operating requirements;
- (6) store waste solvent only in covered containers and not dispose of waste solvent or transfer it to another party, in such a manner that greater than twenty percent (20%) of the waste solvent (by weight) can evaporate into the atmosphere.

326 IAC 8-3-5 (Organic solvent degreasing operations: cold cleaner degreaser operation and control)

The insignificant cold degreaser does not have a remote solvent reservoir and hence will comply with the requirements of 326 IAC 8-3-5 as follows:

- (a) Pursuant to 326 IAC 8-3-5(a) (Cold Cleaner Degreaser Operation and Control), the owner or operator of a cold cleaner degreaser facility shall ensure that the following control equipment requirements are met:

- (1) Equip the degreaser with a cover. The cover must be designed so that it can be easily operated with one (1) hand if:
 - (A) The solvent volatility is greater than two (2) kiloPascals (fifteen (15) millimeters of mercury or three-tenths (0.3) pounds per square inch) measured at thirty-eight degrees Celsius (38°C) (one hundred degrees Fahrenheit (100°F));
 - (B) The solvent is agitated; or
 - (C) The solvent is heated.
 - (2) Equip the degreaser with a facility for draining cleaned articles. If the solvent volatility is greater than four and three-tenths (4.3) kiloPascals (thirty-two (32) millimeters of mercury or six-tenths (0.6) pounds per square inch) measured at thirty-eight degrees Celsius (38°C) (one hundred degrees Fahrenheit (100°F)), then the drainage facility must be internal such that articles are enclosed under the cover while draining. The drainage facility may be external for applications where an internal type cannot fit into the cleaning system.
 - (3) Provide a permanent, conspicuous label which lists the operating requirements outlined in subsection (b).
 - (4) The solvent spray, if used, must be a solid, fluid stream and shall be applied at a pressure which does not cause excessive splashing.
 - (5) Equip the degreaser with one (1) of the following control devices if the solvent volatility is greater than four and three-tenths (4.3) kiloPascals (thirty-two (32) millimeters of mercury or six-tenths (0.6) pounds per square inch) measured at thirty-eight degrees Celsius (38°C) (one hundred degrees Fahrenheit (100°F)), or if the solvent is heated to a temperature greater than forty-eight and nine-tenths degrees Celsius (48.9°C) (one hundred twenty degrees Fahrenheit (120°F)):
 - (A) A freeboard that attains a freeboard ratio of seventy-five hundredths (0.75) or greater.
 - (B) A water cover when solvent is used is insoluble in, and heavier than, water.
 - (C) Other systems of demonstrated equivalent control such as a refrigerated chiller or carbon adsorption. Such systems shall be submitted to the U.S. EPA as a SIP revision.
- (b) Pursuant to 326 IAC 8-3-5(b) (Cold Cleaner Degreaser Operation and Control), the owner or operator of a cold cleaning facility shall ensure that the following operating requirements are met:
- (1) Close the cover whenever articles are not being handled in the degreaser.
 - (2) Drain cleaned articles for at least fifteen (15) seconds or until dripping ceases.
 - (3) Store waste solvent only in covered containers and prohibit the disposal or transfer of waste solvent in any manner in which greater than twenty percent (20%) of the waste solvent by weight could evaporate.

Compliance Requirements

Permits issued under 326 IAC 2-7 are required to ensure that sources can demonstrate compliance with applicable state and federal rules on a more or less continuous basis. All state and federal rules contain compliance provisions, however, these provisions do not always fulfill the requirement for a more or less continuous demonstration. When this occurs IDEM, OAM, in conjunction with the source, must develop specific conditions to satisfy 326 IAC 2-7-5. As a result, compliance requirements are divided into two sections: Compliance Determination Requirements and Compliance Monitoring Requirements.

Compliance Determination Requirements in Section D of the permit are those conditions that are found more or less directly within state and federal rules and the violation of which serves as grounds for enforcement action. If these conditions are not sufficient to demonstrate continuous compliance, they will be supplemented with Compliance Monitoring Requirements, also Section D of the permit. Unlike Compliance Determination Requirements, failure to meet Compliance Monitoring conditions would serve as a trigger for corrective actions and not grounds for enforcement action. However, a violation in relation to a compliance monitoring condition will arise through a source's failure to take the appropriate corrective actions within a specific time period.

Conclusion

The operation of this fiberglass reinforced tube manufacturing source shall be subject to the conditions of the attached Minor Permit Modification No. T141-12313-00141.

VOC

From Degreasing Operation

Company Name: Janco Products, Inc.
Address City IN Zip: 920 South Logan Street, Mishawaka, Indiana 46544
CP: 141-12313
Plt ID: 141-00129
Reviewer: Gurinder Saini
Date: #####

Material	Density (Lb/Gal)	Weight % Volatile (H2O & Organics)	Weight % Water	Weight % Organics	Volume % Water	Volume % Non-Volatiles (solids)	Gal of Mat.	Hours of Operation	Pounds VOC per gallon of coating less	Pounds VOC per gallon of coating	Potential VOC tons per year
R7K94 Degreasing	7.1	100.00%	0.0%	100.0%	0.0%	0.00%	60.00000	832.000	7.09	7.09	2.24

State Potential Emissions

Add worst case coating to all solvents

2.24

METHODOLOGY

Pounds of VOC per Gallon Coating less Water = (Density (lb/gal) * Weight % Organics) / (1-Volume % water)

Pounds of VOC per Gallon Coating = (Density (lb/gal) * Weight % Organics)

Potential VOC Tons per Year = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material *8760 hours/year / Hours of Operation*1ton / 2000 pounds

Appendix A: Emission Calculations
HAP Emission Calculations

Page 2 of 2 TSD App A

Company Name: Janco Products, Inc.
Address City IN Zip: 920 South Logan Street, Mishawaka, Indiana 46544
CP#: 141-12313
Plt ID: 141-00129
Permit Reviewer: Gurinder Saini
Date: August 28, 2000

Material	Density (Lb/Gal)	Gallons of Material	Hours of Operation	Weight % Toluene	Weight % Methyl Ethyl Ketone	Toluene Emissions (ton/yr)	Methyl Ethyl Ketone Emissions (ton/yr)
R7K94 Degreasing Solvent	7.09	60.000000	832.00	20.00%	25.00%	0.45	0.56

Total State Potential Emissions 1.01

METHODOLOGY

HAPS emission rate (tons/yr) = Density (lb/gal) * Gal of Material / Hours of Operation * Weight % HAP * 8760 hrs/yr * 1 ton/2000 lbs